

person's privacy, or be a breach of the law. If we refuse access we will advise you of our reasons for doing so.

10. TRANSBORDER DATA FLOWS

We may transfer your PI if:

- a. you consent to this;
- b. we reasonably believe that the other country has privacy laws substantially similar to our own; or
- c. we take appropriate measures, such as contractual clauses, to secure the transfer of your PI to any recipient located in a country with a level of protection different to Australia.

11. COOKIES

We use cookies to enable us to provide you with a customised web-surfing experience. Cookies are the easiest and least invasive technology available through which we can provide this experience.

Our cookies are "session-only" which means that as soon as you close your browser they are erased from your computer. Your username and session identification are the only pieces of information we obtain through the cookie. We do not track, store, reveal or sell any information about your browsing habits.

12. DATA SECURITY

We take appropriate technical and organisational measures, in accordance with local law requirements, to protect Your PI against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access. To this end, we have implemented technical measures such as firewalls and organisational measures such as a login/efficient password system, physical protection, etc.

13. COMPLAINTS RESOLUTION

If you believe that there may have been possible breaches of your privacy, you may lodge a complaint with us by contacting the Privacy Officer on the details in section 14 below. We will endeavour to respond to your complaint within 14 days of receipt of your complaint.

We expect our procedures will deal fairly and promptly with your complaint. However, if you remain dissatisfied, you may be able to access the services of the Australia Office of the Australian Information Commissioner (OAIC). Details appear below. Complaints must be made in writing

TEL: 1300 363 992

POST: Director of Compliance
Office of the Australian
Information Commissioner

GPO Box 5218
Sydney NSW 2001

WEB: www.oaic.gov.au

14. CONTACTING US

You can contact our Privacy Officer by emailing privacy@accorvacationclub.com.au or by writing to: The Privacy Officer, Accor Vacation Club, PO Box 3755, Robina Town Centre, Qld 4230 Australia

15. UPDATES TO PRIVACY POLICY

We review all our policies and procedures on an ongoing basis to keep up to date with changes in the law, technology and market practice. As a result we may change this policy from time to time.

This policy was last updated on 12 March 2014. A.P.V.C. Limited ABN 54 093 228 141

1. CONSENT TO THE POLICY

You should read this Privacy Policy carefully before providing us with any of Your "Personal Information" ("PI"), i.e. any information collected and recorded in any format that identifies You personally, whether directly (e.g. name) or indirectly (e.g. phone number).

This Privacy Policy is part of APVC Limited's and its related entities' (AVC) terms and conditions governing the Accor Vacation Club and the hotel services run in connection with the Accor Vacation Club. By accepting said terms and conditions, You expressly consent to this Privacy Policy.

We may use Your PI for marketing purposes. If required by applicable law, You will be requested to give Your prior express consent to receive such marketing materials.

2. OUR COMMITMENT

We recognise that your privacy and security are very important. This policy applies to your dealings with AVC and your use of this website. The policy addresses questions and concerns you may have about how we collect, use, hold, access and disclose personal information that comes within our control. The 13 Australian Privacy Principles set out in the Australian Privacy Act 1988 constitute the minimum guidelines for this Privacy Policy. In addition, the Accor S.A. 7 Privacy Principles apply throughout the Accor Group worldwide.

They are:

- a. Transparency: when collecting and processing Your PI, we will provide You with relevant information and notice, for what purposes and who are the recipients.
- b. Legitimacy: we will collect and process Your PI only for the purposes which are mentioned to You in this Privacy Policy.
- c. Relevance & Accuracy: we will only collect PI which is necessary for the purposes of the data processing as set out in this Privacy Policy. We will take all reasonable measures to ensure You that the PI that we have stored is accurate and up to date.
- d. Storage: we will keep Your PI for the period necessary for the purposes of the data processing as set out in this Privacy Policy and in accordance with local law requirements.
- e. Access, Rectification and Objection: we offer You ways to access, modify, correct or delete Your PI. You also have the opportunity to object to the processing of Your PI for marketing purposes. Please see contact details below.
- f. Confidentiality & Security: we will implement reasonable technical and organisational measures to protect Your PI against accidental or unlawful alteration or loss, or from unauthorized use, disclosure or access.
- g. Sharing & International Transfer: we may share Your PI within the Accor Group or with third parties (such as commercial partners and service providers) for the purposes described in this Privacy Policy. We will take appropriate measures to secure such sharing and transfer.

3. COLLECTING PERSONAL INFORMATION

Where possible we collect personal information directly from you. However, we may also collect from publically available sources and/or from other persons and organisations. Collection may take place in a number of ways:

- when you enter your personal information on our site, for example, when filling out a member registration form or requesting further information about the Accor Vacation Club;
- When you complete an entry form to one of our trade promotions competitions such as "Winners are Grinners" at shopping centres, trade fairs, websites, or special events;
- when you contact us, we will keep a record of that contact;
- when your internet browser accepts our cookie;
- When you attend one of our sales presentations;
- by way of referral from your friends or relatives who attended one of our presentations;
- When we purchase a data list from one of the many commercial list providers in Australia;
- When we contact you over the telephone;
- When you request goods, services or information from us;
- When we provide you with hospitality services, such as when you book into one of our properties, check in and out or make a complaint about our services;

4. WHAT IS PERSONAL INFORMATION?

The PI we might collect includes:

- Contact information, e.g. name, telephone numbers, e-mail addresses, postal addresses,;
- Your marital status and, if you have a partner, your partner's contact information;
- Your age, occupation details, combined household income, whether you own or rent your own home, and your personal interests;
- Other personal details: date of birth; nationality,
- Children Information: name, birth date and age;
- Membership card numbers of any Accor loyalty program or any membership number of frequent flyer or any of Accor's partners You are registered with;
- Your dates of arrival and departure/visit from our hotels;

In addition, if you apply to become a member of the Accor Vacation Club PI that we might collect includes:

- Details about your preferred holidays; and
- Details about your financial situation.

We do not knowingly collect PI from children under the age of 18, except name, date of birth and nationality as provided directly by an adult on their behalf or with adult's permission. Please make sure that Your children do not provide us with any PI without Your permission, e.g. online. If You believe Your child has submitted PI to us, please contact us so that we can delete such PI.

Generally, we do not knowingly collect sensitive information such as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health or sex life details.

5. USE OF YOUR PERSONAL INFORMATION

The information you provide to us may be used for one of the purposes detailed below or to provide goods, services or information requested by you:

- a. To provide you with services offered in conjunction with your membership of the Accor Vacation Club;
- b. To manage any reservations and bookings that you may have with us;
- c. To manage your stay at any of our properties;
- d. To improve our hospitality services including to:
 - a. Process your personal information in our client management system;
 - b. To better understand your needs and requests;
 - c. To tailor our products and services to better suit Your desires;
- e. To send you newsletters, promotions and marketing material about the Accor Vacation Club, tourism, hospitality or services, hotel promotions, partners of Accor SA or to contact you by telephone. You can chose to unsubscribe to any of our communications by following the instructions on such communications;
- f. To invite you to take part in one of our sales promotions, to invite you to stay at one of our resorts and attend a sales presentation while you are there;
- g. To comply with any local regulations;
- h. to secure and improve your use of AVC's website including:
 - a. to improve website navigation; and
 - b. to implement security and fraud prevention means;
- i. to improve AVC's services, including:
 - a. to conduct surveys and analyse responses to questionnaires;
 - b. to manage complaints of members and guests;
 - c. to let you benefit from Accor SA's loyalty program.

The information you provide to us may also be disclosed to A.P.V.C. Limited's related entities &/or service providers for the purposes referred to above.

Subject to any restrictions imposed on us by legislation, and where we have disclosed that purpose to you at the time of collecting your information, we may also supply your information to third parties with whom we have contracted to provide information unless you have indicated that we do not have your consent to do this.

6. SHARING YOUR PERSONAL INFORMATION

AVC is part of Accor SA. Accor SA is part of a global company, which strives to offer you the same level of service and hospitality all around the world. To this end, AVC may share your PI with internal and external recipients in the following ways:

- a. The Accor Group: we may share Your PI with any Accor S.A. entity authorized individuals who need to access Your PI to provide You with the requested services or in the context of an action as a consequence of You providing such PI:
 - Hotel Staff;
 - Reservation Staff using Accor S.A. reservation tools;
 - Information Technology, commercial partnership and marketing departments;
 - Medical services, if any;
 - Legal Department, if necessary; and
 - Any relevant individuals of the Accor Group entities for specific categories of data.
- b. External service providers and partners: we may share Your PI with third parties for providing You with the requested services and improving Your stay with us:
 - Third party service providers: IT subcontractors, international call centers, banks, credit card providers; outside counsels, mailing service providers, printing companies;
 - Commercial Partners.
- c. Local authorities – internal investigations: we may also share information with local authorities if required by local law or as part of internal investigations within the Accor Group in compliance with local regulations.

6. DISCLOSURE OF YOUR PERSONAL INFORMATION

Your personal information will only be disclosed and used for the primary purpose for which it was collected and the secondary purposes outlined above, except where such other use, or disclosure;

- Is related to the main purpose for which we collected your personal information and you would reasonably expect us to use the personal information for that other purpose;
- Has been precluded by your notification to us that we do not have your consent to do so;
- Is permitted or required by Law;
- Is necessary on health and public safety grounds.

7. SECURITY

We will take all reasonable precautions to protect personal information from misuse and loss. We do not retain any information where we have identified that it is no longer needed and access to information is restricted to those who are required to access it and may be encrypted &/or protected by password.

8. NO CONTACT REQUESTS

If you do not wish to receive offers about our products or services or for us to pass your information on to our related entities, allied suppliers or contracted third parties for them to forward offers to you, then please let us know by contacting our Privacy Officer. Contact details appear below.

9. ACCESS AND CORRECTION

You may access your personal information by contacting our Privacy Officer as detailed below. Any charge we may make for providing access will be reasonable. If you show us that your personal information is inaccurate, we will take reasonable steps to correct it.

Please note that we need not provide access to personal information in several types of situations, for example where a request is frivolous, or where to provide access would pose a threat to health or public safety, unreasonably interfere with another